



May 10, 2023

VIA ECF

Hon. James M. Wicks
U.S. District Court, EDNY
100 Federal Plaza, Courtroom 1020
Central Islip, New York 11722

Re: *LaMarco v. Suffolk County*
22 Civ. 4629 (GRB) (JMW)

Your Honor,

I represent the plaintiffs, Thomas and Diane LaMarco, in the above-referenced matter. I write with regard to the impending discovery deadline of May 15, 2023 to request an extension of time to complete discovery.

The reason for the request is that Defendants objected to a number of Plaintiffs' demands for documents and electronically stored information and counsel for the parties are attempting to resolve the issues without the need for Court intervention. Also thwarting the production of documents that were not objected to was, as described by counsel, Defendants' inability to access email communications because of last year's ransomware attack.

I am informed by counsel that Defendants may be willing to withdraw a number of their objections to Plaintiffs' demands. I am awaiting a written revision of Defendants' response based on the withdrawal of certain objections, as well as the production of previously withheld documents.

I reached out to counsel by email today for an expected timeframe for the production of Defendants' amended responses and previously withheld documents. By email response, counsel provided the most recent SCPD Pistol License Handbook and application instructions, and informed that Defendants forwarded to her "a number of additional documents that may be responsive to plaintiffs' demand. Obviously, I need to review the documents to confirm that they are in fact responsive and not privileged or previously produced. As I am resuming a trial on Monday, I will need at least two weeks to do the review. In the interim, I can provide you with any additional appropriate documents on a rolling basis as they are reviewed."

In light of counsel's trial schedule and indication that at least 2 weeks will be required to review the documents currently in her possession, perhaps the Court would be willing to discuss Defendants' progress and a revised discovery schedule at the previously scheduled June 9th Zoom conference.

Thank you for Your Honor's consideration.

Sincerely,

Amy L. Bellantoni
Amy L. Bellantoni

cc: Arleen Zwilling (via ECF)